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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION - SAGE  
MEMORIAL HOSPITAL, INC. (doing  
business as "Sage Memorial Hospital"); an  
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,  
LLC; a Nevada limited liability company  
(doing business as "Razaghi Healthcare"),  
AHMAD R. RAZAGHI; individually,  
TAUSIF HASAN; individually, DOES 1-10;  
ROES A-Z,

Defendants.

Case No. 2:19-cv-00329-GMN-EJY

**STIPULATION TO EXTEND TIME TO  
RESPOND TO THIRD-PARTY  
COMPLAINT**

**[SECOND REQUEST]**

RAZAGHI DEVELOPMENT COMPANY,  
LLC; an Arizona limited liability company,

Counterclaimant and  
Third-Party Plaintiff,

vs.

CHRISTI EL-MELIGI; an unmarried person,  
NETRISHA DALGAI; an unmarried person,  
STEPHEN D. HOFFMAN and JANE DOE  
HOFFMAN; a married couple, LEWIS  
BRISBOIS BISGAARD & SMITH, LLP; a  
California Limited Liability Partnership,

1 Third Party Defendants.

2  
3 and

4 NAVAJO HEALTH FOUNDATION - SAGE  
5 MEMORIAL HOSPITAL, INC. (doing  
6 business as "Sage Memorial Hospital"); an  
7 Arizona non-profit corporation,

Counterdefendant.

8 Third-Party Plaintiff RAZAGHI DEVELOPMENT COMPANY, LLC (hereinafter "RDC")  
9 and Third-Party Defendant LEWIS BRISBOIS BISGAARD & SMITH LLP (hereinafter "Lewis  
10 Brisbois"), through their respective counsel, hereby submits the following Stipulation to Extend  
11 Time to File Response to Second Amended Third-Party Claims (Second Request):

12 **RECITALS**

13 WHEREAS, RDC filed its Second Amended Third-Party Claims [ECF No. 217] on  
14 November 29, 2022;

15 WHEREAS, Lewis Brisbois' Las Vegas office received RDC's Summons and Second  
16 Amended Third-Party Claims on or about December 9, 2022;

17 WHEREAS, on December 27, 2022, counsel for Lewis Brisbois contacted counsel for RDC  
18 (collectively "counsel for the parties") and requested an extension until January 16, 2023 for Lewis  
19 Brisbois to file a response to the Second Amended Third-Party Claims, due to pendency of the  
20 holiday season and to allow sufficient time to review RDC's allegations; this stipulation was agreed  
21 to between counsel [ECF No. 222] and this Court granted the parties' Stipulation [ECF No. 223];

22 WHEREAS, on January 5, 2023, counsel for the parties attended a telephone conference to  
23 discuss RDC's third-party claims, and it was determined that additional time will be necessary for  
24 Lewis Brisbois to evaluate the information provided by counsel for RDC beyond the current due  
25 date for Lewis Brisbois to file a response to the Second Amended Third-Party Claims;

26 NOW, THEREFORE, RDC and Lewis Brisbois hereby enter into the following stipulation:

27 **STIPULATION**

28 1. Lewis Brisbois shall have up to and including Tuesday, January 31, 2023, in which

1 to file a response to RDC's Second Amended Third-Party Claims.

2           2.       The stipulated extension of time for Lewis Brisbois to file a response to RDC's  
3 Second Amended Third-Party Claims does not operate as any admission against interest by RDC,  
4 nor does it operate as a waiver of any objection or defense that Lewis Brisbois may have with regard  
5 to the claims set forth in the Second Amended Third-Party Claims [ECF No. 217], to the jurisdiction  
6 or venue of this Court, or to service and service of process.

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This is Lewis Brisbois' second request for an extension. RDC and Lewis Brisbois' stipulation is not intended for an improper purpose or to cause delay, but is the result of good faith discussions between counsel.

DATED this 13<sup>th</sup> day of January, 2023.

DATED this 13<sup>th</sup> day of January, 2023.

**FISHER & PHILLIPS LLP**

**LEWIS BRISBOIS BISGAARD & SMITH LLP**

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*Attorneys for Third-Party Defendants Stephen  
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LLP*

**ORDER**

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE

Dated: January 13, 2023